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Attorneys for
TIGER NATURAL GAS, INC.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re)	CASE NO. 19-30089 (DM)
)	
PACIFIC GAS AND ELECTRIC)	Chapter 11
COMPANY,)	
)	TIGER NATURAL GAS INC.'S
Debtor.)	REQUEST FOR JUDICIAL NOTICE IN
)	SUPPORT OF ITS MOTION FOR
)	RELIEF FROM THE AUTOMATIC
)	STAY
)	
)	Date: November 13, 2019
)	Time: 10:00 AM
)	Judge: Hon. Dennis Montali
)	Ctrm: 17

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Pursuant to Rule 201 of the Federal Rules of Evidence, Tiger Natural Gas, Inc.'s
("Tiger") respectfully asks that the Court take judicial notice of documents from the case styled

1 *Tiger Natural Gas, Inc. v. Pacific Gas and Electric Company et al.*, Case No. 4:16-CV-0671-JSW,
2 currently pending in the District of Northern California (the “District Court Case”), listed below in
9 connection with Tiger’s concurrently-filed Motion for Relief from the Automatic Stay:

10 Exhibit 1: Tiger’s Complaint;

11 Exhibit 2: Minute Entry Regarding Initial Case Management Conference;

12 Exhibit 3: Order Denying Defendant’s Motion for Temporary Stay or Extension of Time to
13 Complete Limited Discovery;

14 Exhibit 4: Order on Discovery Dispute Regarding Requests for Production of Documents;

15 Exhibit 5: Order Granting Motion to Extend Fact Discovery Deadline;

16 Exhibit 6: Order Regarding Discovery Dispute; and

17 Exhibit 7: Case docket.

18 Fed. R. Evid. 201 allows district courts to take judicial notice of facts that are either
19 generally known within their territorial jurisdiction, or that can be accurately and readily
20 determined from sources whose accuracy cannot reasonably be questioned. The rule allows courts to
21 take judicial notice of court filings and other matters of public record. *See Reyn’s Pasta Bella, LLC*
22 *v. Visa USA, Inc.*, 442 F. 3d 741, 746 n. 6 (9th Cir. 2006).

23 Tiger requests this Court take judicial notice of court documents in the District Court Case.
24 These documents are appropriate subjects of a Request for Judicial Notice because they are
25 publically available, readily available on Pacer.gov, and there can be no question as to their
26 authenticity. Accordingly, Tiger requests that the Court take judicial notice of Exhibits 1–7, which
27 are attached as exhibits to the Declaration of Leah E. Capritta filed in support of Tiger’s Motion
28 for Relief from the Automatic Stay.

Dated: October 18, 2019

HOLLAND & KNIGHT LLP

By: /s/ Leah E. Capritta
Leah E. Capritta

Attorneys for Tiger Natural Gas, Inc.

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